

STATE OF IDAHO  
DEPARTMENT OF WATER RESOURCES

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NOV 24 2003

Department of Water Resources

## NOTICE OF PROTEST

This form may be used to file a protest with the department under section 42-108B, 42-203A, 42-203C, 42-211, 42-222 and 42-224, Idaho Code. The department will also accept a timely protest not completed on this form if it contains all the necessary information.

1. Matter being protested Application of North Snake Ground Water District and Magic Valley Ground Water District for Approval of Preliminary Mitigation Plan

2. Name of Protestant United States Department of Interior Bureau of Reclamation

3. Protestant's representative for service (if different than Protestant)

E. Gail McGarry, Manager Water Rights and Acquisition, Pacific Northwest Regional Office, Bureau of Reclamation

Kathleen Carr, Esq., Office of the Field Solicitor, U.S. Department of the Interior

4. Service mailing address

E. Gail McGarry, PN-3100, Bureau of Reclamation, 1150 North Curtis Road, Suite 100, Boise Idaho 83706

Kathleen Carr, Esq., Office of the Field Solicitor, U.S. Department of the Interior, 550 West Fort Street, Boise, ID 83724

5. Service telephone number (208) 334-1911, Kathleen Carr

6. Basis of protest (including statement of facts and law upon which the protest is based)

The mitigation plan provides an inadequate standard to protect senior water rights from injury.

In addition, the mitigation plan proposes to provide mitigation water over a five-year period that will allow for yearly deficits. Also, it proposes that the mitigation water will be derived from sources that are potentially speculative as the State is undergoing a severe drought.

7. What would resolve your protest?

I hereby, acknowledge that if I, or my designated representative, fails to appear at any regularly scheduled conference or hearing in the matter of which I have been notified at the address above, the department may issue a notice of proposed default against me in this matter for failure to appear. I also verify that I have served a copy of this protest upon the applicant.

Signed this 24th day of Nov., 2003

Bureau of Reclamation, U.S. Dept of Interior

PROTESTANT

E. Gail McGarry

PROTESTANT'S REPRESENTATIVE

### Certificate of Service

The undersigned does hereby certify that on this 24<sup>th</sup> day of Nov., 2003, he or she caused a true and correct copy of the Protest of the Application of North Snake Ground Water District and Magic Valley Ground Water District for Approval of a Preliminary Mitigation Plan transmitted by U.S. mail to the following:

Jeffrey C. Fereday  
Michael C. Creamer  
Deborah E. Nelson  
Givens Pursley, LLP  
P.O. Box 2720  
Boise, ID 83701-2720

and hand delivered to:

The Idaho Department of Water Resources  
1301 North Orchard  
Boise, Idaho 83706-2237

E. Joel McGarry

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Department of Water Resources

STATE OF IDAHO  
DEPARTMENT OF WATER RESOURCES

NOTICE OF PROTEST

1. **Matter being protested:** Application for Approval of Preliminary Mitigation Plan in the name of North Snake Ground Water District and Magic Valley Ground Water District.
2. **Name of Protestants:** City of Pocatello  
Basic American Foods  
ConAgra/Lamb Weston
3. **Protestants' Representative for Service:** Josephine P. Beeman  
Beeman & Associates, P.C.
4. **Service mailing address:** 409 W. Jefferson Street  
Boise, ID 83702
5. **Service telephone no.:** 208-331-0950 (Fax – 208-331-0954)
6. **Basis of protest (including statement of facts and law upon which the protest is based):**

The City of Pocatello, Basic American Foods and ConAgra/Lamb Weston are ground water and surface water users in Water District 120. The City of Pocatello, Basic American Foods, and ConAgra/Lamb Weston are parties to the Interim Stipulated Agreement for Processors and Municipalities within and near IDWR Administrative Basins 35 and 36 ("Processors/Cities Interim Agreement"), effective through December 31, 2003, which operates in Water Districts 120 and 130. Before the Processors/Cities Interim Agreement expires, it will be incorporated into a mitigation plan.

The Application for Approval of Preliminary Mitigation Plan filed by North Snake Ground Water District and Magic Valley Ground Water District ("NSGWD/MVGWD Preliminary Mitigation Plan") implicates the review and approval of any mitigation plan for the City of Pocatello, Basic American Foods, and ConAgra/Lamb Weston. The right of the City of Pocatello, Basic American Foods, and ConAgra/Lamb Weston to continue ground and surface water diversions, and the procedural and legal protections afforded them by the Conjunctive Management Rules, the Processors/Cities Interim Agreement, and future review, approval and administration of mitigation plans in Water Districts 120 and 130 and elsewhere, may be directly and substantially affected by the Idaho Department of Water Resources' (IDWR) process and final order approving the NSGWD/MVGWD Preliminary Mitigation Plan, and any subsequent exception, reconsideration, or judicial review of IDWR's decision.

This protest is for the purpose of confirming that applicable factual and legal standards are addressed in the processing of the NSGWD/MVGWD Preliminary Mitigation Plan. Written comments about such standards already exist in IDWR's public file for Water District 130.<sup>1</sup> These standards include use of the best evidence available as regards actual water right rates (cumulative), priority dates (cumulative), and measured use for ground water and surface water rights in Water District 130. Such facts include spring and surface water right limitations arising from subordination provisions, self-limiting provisions, combined diversion limits, re-use issues, and diversion capacity limitations.

In addition, appropriate consideration needs to be given to depletions to the Thousand Springs reach (from surface water transfers, changes in surface water irrigation, or ground water withdrawals outside of Water District 130) which cannot be attributed to ground water withdrawals in Water District 130.

To the extent applicable, essential components of the legal framework that must be utilized and accounted for in administering water rights and evaluating mitigation plans within the ESPA, Water District 130 specifically, and the broader Swan Falls drainage are as follows: the Swan Falls Agreement, the Swan Falls Contract, the Swan Falls consent judgments, State Water Plans adopted by the legislature, and other appropriate contractual instruments, decrees, and related documents already in the public record for Water District 130.

#### **7. What would resolve your protest?**

The City of Pocatello, Basic American Foods, and ConAgra/Lamb Weston want to confirm that the proceedings and decisions related to the NSGWD/MVGWD Preliminary Mitigation Plan are based on the applicable factual and legal standards of the conjunctive management rules, the prior appropriation doctrine, IDWR's authority under Idaho Code Title 42, Chapter 6, and other applicable law.

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<sup>1</sup> Water District 130 encompasses both NSGWD and MVGWD.

I hereby acknowledge that if I, or my designated representative, fail to appear at any regularly scheduled conference or hearing in the matter of which I have been notified at the address above, the Department may issue a notice of proposed default against me in this matter for failure to appear. I also verify that I have served a copy of this protest upon the applicant.

Signed this 24<sup>th</sup> day of November 2003.

By Josephine P. Beeman  
Josephine P. Beeman  
Attorney for Protestants City of Pocatello,  
Basic American Foods, and ConAgra/Lamb Weston

Service made upon applicant at the following address:

Jeffrey C. Fereday  
Michael C. Creamer  
Deborah E. Nelson  
Givens Pursley, LLP  
601 West Bannock Street  
P. O. Box 2720  
Boise, ID 83701-27201

Service is also made on the following protestants at the following addresses:

Fritz Wonderlich  
Attorney for City of Twin Falls  
Wonderlich & Wakefield  
P. O. Box 1812  
Twin Falls, ID 83303-1812

Bureau of Reclamation  
1150 N. Curtis Road, Suite 100  
Boise, ID 83706

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JUN 24 2003

Department of Water Resources

John K. Simpson  
BARKER ROSHOLT & SIMPSON LLP  
205 N. 10<sup>th</sup> Street, Suite 520  
P.O. Box 2139  
Boise, Idaho 83701-2139  
Telephone: (208) 336-0700  
Fax: (208) 344-6034  
ISB # 4242

BEFORE THE DEPARTMENT OF WATER RESOURCES  
OF THE STATE OF IDAHO

IN THE MATTER OF THE )  
APPLICATION OF NORTH SNAKE )  
DISTRICT AND MAGIC VALLEY )  
GROUND WATER DISTRICT )  
FOR APPROVAL OF A PRELIMINARY )  
MITIGATION PLAN )  
\_\_\_\_\_ )

NOTICE OF PROTEST

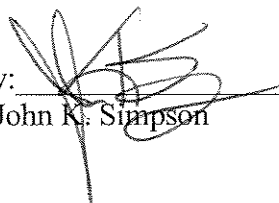
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COMES NOW Buckeye Farms, by and through its attorneys of record, Barker Rosholt & Simpson LLP and hereby protest the proposed preliminary mitigation plan submitted by North Snake Ground Water District and the Magic Valley Water District to the Idaho Department of Water Resources. Buckeye Farms owns decreed water rights from various spring sources in the Hagerman Valley for irrigation, fish propagation, recreation and aesthetic uses. The plan as submitted is inadequate by its terms and fails to provide the appropriate relief to senior water rights reliant upon the hydraulically connected springs and the aquifer as the source of water to satisfy rights. Moreover, the proposed plan fails to satisfy Rule 43 of the Rules on Conjunctive Management of Surface and Ground Water

and Ground Water Resources, IDAPA § 37.03.011. Further, the plan makes certain factual statements not accurate. Buckeye Farms further reserves the right to allege further deficiencies in the plan in the proceedings before the Department and requests notice of any future conferences or hearings on the above captioned petition.

DATED this 24th day of November, 2003.

BARKER ROSHOLT & SIMPSON

By:   
John K. Simpson

CERTIFICATE OF MAILING

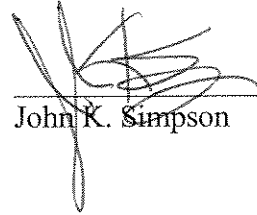
I hereby certify that on this 24th day of November, 2003, I served a copy of the foregoing NOTICE OF PROTEST, by depositing same in the United States mail, postage prepaid, in an envelope, addressed to the following:

Karl Dreher  
Idaho Department of Water Resources  
1301 N. Orchard  
Boise, Idaho 83706

Michael C. Creamer  
Givens Pursley  
P.O. Box 2720  
Boise, Idaho 83701-2720

North Snake Ground Water District  
Attn: Mike Faulkner  
152 E. Main Street  
Jerome, Idaho 83338

Magic Valley Ground Water District  
Attn: John Stevenson  
Orlo Maughn  
453 West 900 North  
Rupert, Idaho 83350



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John K. Simpson



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Department of Water Resources

James S. Lochhead, Esq.  
Wayne F. Forman, Esq.  
Avra O. Morgan, Esq.  
Brownstein Hyatt & Farber, P.C.  
410 17<sup>th</sup> Street  
Twenty-Second Floor  
Denver, Colorado 80202  
Telephone: 303.223.1100  
Facsimile: 303.223.1111

John K. Simpson  
Barker, Rosholt & Simpson, L.L.P.  
205 N. 10<sup>th</sup> Street, Suite 520  
P. O. Box 2139  
Boise, Idaho 83701-2139  
Telephone: 208.336.0700  
Facsimile: 208.344.6034

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF THE )  
APPLICATION OF NORTH SNAKE )  
GROUND WATER DISTRICT AND ) PROTEST  
MAGIC VALLEY GROUND WATER )  
DISTRICT FOR APPROVAL OF A )  
PRELIMINARY MITIGATION PLAN )

Idaho Power Company ("Idaho Power"), by and through its counsel, Barker, Rosholt & Simpson, L.L.P. and Brownstein Hyatt & Farber, P.C., respectfully submits to the Idaho Department of Water Resources (the "Department") its Protest to the Application of the North Snake Ground Water District and the Magic Valley Ground Water District (collectively, the "Districts" or "Applicants") for Approval of a Preliminary Mitigation Plan (the "Plan"). In support of its Protest, Idaho Power states as follows:

**I. Name, mailing address and telephone number of Protestant:**

Idaho Power Company  
1221 W. Idaho St.  
Boise, ID 83702  
Tel: (208) 388-2200

## II. Grounds for Protest.

1. The Eastern Snake Plain Aquifer is hydraulically connected to the Snake River and tributary surface water sources, including specifically the Thousand Springs Reach. The Eastern Snake Plain Aquifer and hydraulically connected surface sources are overappropriated and junior water rights must be curtailed in accordance with the prior appropriation doctrine in order to satisfy senior water rights. (See, Final Order Creating Water District No.130, at 4; see also Order on Cross Motions for Summary Judgment, Subcase 91-00005, Basin-Wide Issue 5, at 31.)

2. Idaho Power owns water rights tributary to the Snake River. Operation of the Plan will cause material injury to the water rights of others within the Snake River Basin, including those owned by Idaho Power, through the continuation of out of priority depletions under junior water rights. See Rules Conjunctive Management of Surface and Ground Water Resources, IDAPA § 37.03.11, Rule 43.03.c. and j. (hereinafter “Rule \_\_\_”)

3. The Districts have failed to meet their burden to provide the Director of the Department of Water Resources (the “Director”) with sufficient information demonstrating that the Plan will protect senior water rights from material injury. See Rule 43. Among the deficiencies in the Plan as filed are the following:

(a) The Plan does not provide replacement water “sufficient to offset the depletive effect of ground water withdrawals . . . at the time and place required by senior-priority water rights”. Rule 43.03.c. The Plan does not address the timing, location or quality of replacement water. Further, the Plan does not attempt to calculate the depletive effect of the ground water withdrawals at issue, nor does it calculate the Districts’ total diversions or consumptive use of water under the water rights subject to the Plan. Rule 43.03.e., f. and g.

(b) The Plan fails to identify the actual source of replacement water the Districts propose to use, or that the source of replacement water is reliable. Rule 43.03.h. The Plan does not indicate that Applicants have any firm commitment, in the form of a contract, lease or purchase agreement, to acquire water from any other specific source.

(c) The Plan does not adequately describe the Districts’ proposed method of delivery, storage or use of replacement water, making it impossible for the Director to determine whether material injury to water rights will be prevented.

(d) The Plan fails to identify either the senior water users that are the intended beneficiaries of the replacement water to be provided under the Plan, or the junior wells whose out-of-priority withdrawals must be replaced under the Plan. Rule 43.01.b.

(e) Because the Plan is for a limited duration of five years, it does not address the replacement of lagged out-of-priority depletions accruing after the close of the five-

year period. Rule 43.03.c.

(f) The “Contingency Plan” described in the Plan fails to “assure protection of the senior-priority right in the event the mitigation water source becomes unavailable[.]”. 43.03.c.

(g) The Plan does not contain any real means of enforcement and is largely voluntary. Rule 43.03.k.

(h) The Plan is not consistent with the public interest. Rule 43.03.j. It is well established under Idaho law that water must be administered consistent with the doctrine of prior appropriation. See Musser v. Higginson, 871 P.2d 809 (Idaho 1994); I.C. § 42-602.

(i) Because the Plan does not attempt to quantify the depletive effects of ground water pumping by the Districts, and does not clearly identify a plan for providing replacement water to seniors, the Plan would allow junior ground water pumpers to enlarge their water rights by withdrawing ground water out-of-priority to the injury of junior and senior appropriators. Rule 43.03.i.

(j) The Plan fails to propose “artificial recharge of an area of common ground water supply as a means of protecting ground water pumping levels or compensating senior priority rights[.]” Rule 43.03.d.

(k) The Plan does not assure maintenance of the water quality historically enjoyed by senior water users, which is an integral part of their vested water rights.

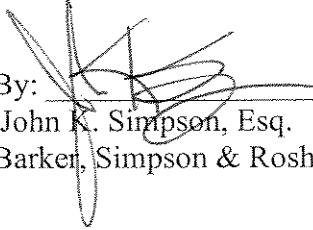
4. The Plan contains inadequate information on which to fully assess the extent to which other water users including Idaho Power will be injured under its terms. Idaho Power reserves the right to supplement its objections and to assert additional grounds for objection to the Plan following completion of discovery.

### **III. Request for Relief.**

The Plan on its face fails to meet the requirements of Rule 43, and, accordingly, Idaho Power requests the Director to dismiss or deny the Plan. Idaho Power requests a hearing on the Plan following adequate discovery in accordance with the Rules of Procedure of the Idaho Department of Water Resources. Any order granting the Plan should be made only pursuant to terms and conditions adequate to prevent material injury to other water rights.

Dated this 24<sup>th</sup> day of November, 2003.

IDAHO POWER COMPANY

By: 

John K. Simpson, Esq.  
Barker, Simpson & Rosholt, L.L.P.

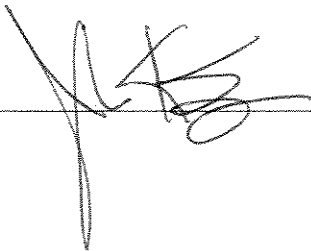
and

James S. Lochhead, Esq.  
Wayne Forman, Esq.  
Avra O. Morgan, Esq.  
Brownstein Hyatt & Farber, P.C.  
410 17<sup>th</sup> Street  
Twenty-Second Floor  
Denver, CO 80202

CERTIFICATE OF SERVICE

I hereby certify that on this 24<sup>th</sup> day of November 2003 a true and correct copy of the foregoing PROTEST was deposited in the United States Mail, postage prepaid addressed to:

Jeffrey C. Fereday  
Michael C. Creamer  
Deborah E. Nelson  
Givens Pursley, LLP  
601 West Bannock Street  
P.O. Box 2720  
Boise, Idaho 83701-2720



---

Jason R. Miciak, P.C. ISB #5710  
Attorney at Law  
139 River Vista Place, Suite 102  
P.O. Box 2632  
Twin Falls, Idaho 83303-2632  
Telephone: (208) 734-5444  
FAX: (208) 734-5605  
Email: [jmiciak@yahoo.com](mailto:jmiciak@yahoo.com)

Counsel for Pristine Springs, Inc. &  
SeaPac of Idaho, Inc.

**BEFORE THE DEPARTMENT OF WATER RESOURCES OF  
THE STATE OF IDAHO**

IN THE MATTER OF THE	)	
APPLICATION OF THE NORTH	)	
SNAKE GROUND WATER DISTRICT	)	<b>PETITION TO INTERVENE AND</b>
AND MAGIC VALLEY GROUND	)	<b>OBJECTION TO PROPOSED</b>
WATER DISTRICT FOR APPROVAL	)	<b>MITIGATION PLAN FOR WATER</b>
OF A PRELIMINARY MITIGATION	)	<b>DISTRICT 130</b>
PLAN	)	
_____	)	

COMES NOW, Claimants Pristine Springs, Inc. and SeaPac of Idaho Inc. through their attorney Jason R. Miciak, P.C., to file this *Petition to Intervene and Objection to the Proposed Mitigation Plan for Water District 130*. The above Claimants had sent correspondence to the Idaho Department of Water Resources expressing their position on the proposed Mitigation Plan prior to November 24, 2003. The correspondences have not been recognized as formal objections by the Idaho Department of Water Resources, thus requiring this *Petition to Intervene*. Claimants expressly object to the proposed Mitigation Plan and petition to be involved as an objecting party to this Administrative Proceeding.

Claimants possess the following water rights which are impacted negatively by the proposed Mitigation Plan and are connected to the Eastern Snake Plain Aquifer:


Pristine Springs Inc.: 36-00200, 36-02603C, 36-02603D, 36-02607, 36-15218, 36-02040, 36-07130, 36-15180, 36-15336, 36-15378, 36-02039.

SeaPac of Idaho: 36-07072, 36-07866, 36-08356.

The basis for Claimants' Objection is that under Article XV of the Idaho State Constitution, Claimants' water rights are constitutionally protected senior water rights, upon which a mitigation plan may not be unilaterally imposed. Additionally, the plan does not list the senior water rights which the plan proposes to mitigate. Finally, the plan is inadequate as a matter of fact and law because it fails to mitigate the Claimants' injury caused by junior diversions from the ESPA.

Claimants seek notice of all proceedings in this Administrative Action and a meaningful opportunity to be heard.

DATED this 5<sup>th</sup> day of December, 2003.

  
\_\_\_\_\_  
Jason R. Miciak, P.C.  
Counsel for Pristine Springs, Inc. and  
SeaPac of Idaho, Inc.

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5<sup>th</sup> day of December, 2003, the above and foregoing document was served by placing a copy of the same in the United States mail, postage prepaid and properly addressed to the following:

#### APPLICANT:

NORTH SNAKE GROUND WATER  
DISTRICT  
MAGIC VALLEY GROUND WATER  
DISTRICT  
C/O JEFFREY C FEREDAY  
MICHAEL C CREAMER  
DEBORAH E. NELSON  
GIVENS PURSLEY LLP  
PO BOX 2720  
BOISE ID 83701-2720

#### PROTESTANTS:

CITY OF TWIN FALLS  
C/O FRITZ WONDERLICH  
WONDERLICH & WAKEFIELD  
PO BOX 1812  
TWIN FALLS ID 83303-1812

US DEPT OF INTERIOR  
BUREAU OF RECLAMATION  
C/O E GAIL MCGARRY  
PN-3100  
1150 N CURTIS RD STE 100  
BOISE ID 83706

US DEPT OF INTERIOR  
BUREAU OF RECLAMATION  
C/O KATHLEEN CARR  
OFFICE OF THE FIELD SOLICITOR  
US DEPT OF THE INTERIOR  
550 WEST FORT ST MSC-020  
BOISE ID 83724

CITY OF POCA TELLO  
BASIC AMERICAN FOODS  
CON AGRA/LAMB WESTON  
C/O JOSEPHINE P BEEMAN  
BEEMAN & ASSOCIATES PC  
409 W JEFFERSON ST  
BOISE ID 83702

CLEAR LAKES TROUT CO  
FISHERIES DEVELOPMENT CO  
RIM VIEW TROUT CO  
ESTATE OF EARL M HARDY  
C/O DANIEL V STEENSON  
CHARLES L HONSINGER  
S BRYCE FARRIS  
RINGERT CLARK CHARTERED  
PO BOX 2773  
BOISE ID 83701-2773

CLEAR SPRINGS FOODS INC  
IDAHO POWER CO  
BUCKEYE FARMS  
C/O JOHN K SIMPSON  
BARKER RSHOLT & SIMPSON  
PO BOX 2139  
BOISE ID 83701-2139

IDAHO POWER CO  
C/O JAMES S LOCHHEAD  
WAYNE F FORMAN  
AVRA O MORGAN  
BROWNSTEIN HYATT & FARBER  
410 17<sup>TH</sup> STREET 22<sup>ND</sup> FLR  
DENVER CO 80202



TWIN FALLS CANAL CO  
C/O JOHN A ROSHOLT  
BARKER ROSHOLT & SIMPSON  
233 2<sup>ND</sup> ST N STE D  
TWIN FALLS ID 83301

BILLINGSLEY BAY FARMS  
PETER STURDIVANT  
RANGEN INC  
C/O J DEE MAY  
MAY SUDWEEKS & BROWNING  
PO BOX 1846  
TWIN FALLS ID 83303-1846

AQUARIUS AQUACULTURE  
C/O DAVID HUFF  
2674 NORWOOD DR  
HAGERMAN ID 83332

ARK FISHERIES INC  
C/O LYNN BABINGTON  
2849 S 850 EAST  
HAGERMAN ID 83332

BABINGTON ENTERPRISES INC  
C/O LYNN BABINGTON  
2849 S 850 EAST  
HAGERMAN ID 83332

PATSY BANNING  
938 PIONEER ROAD  
HAGERMAN ID 83332

BELL DITCH  
C/O ROBERT BRADLEY GISLER  
755 E 2800 SOUTH  
HAGERMAN ID 83332

JOHN BELL DITCH ASSN  
C/O ERNEST S WOOD  
LAYNE OSBORNE  
PO BOX 1846  
TWIN FALLS ID 83303-1846

VERL C BELL  
853 E 2830 SOUTH  
HAGERMAN ID 83332

BIG BEND TROUT INC  
C/O LEO E RAY  
PO BOX 1846  
TWIN FALLS ID 83303-1846

BIG SPRINGS WATER USERS ASSN  
C/O GARY LEMMON  
PO BOX 1846  
TWIN FALLS ID 83303-1846

BILLINGSLEY CREEK LODGE &  
RETREAT  
C/O PATRICIA A KEENEY  
PO BOX 308  
HAGERMAN ID 83332-0308

BILLINGSLEY CREEK RANCH  
C/O DONNIE MC FADDEN  
2726-D S 1050 EAST  
HAGERMAN ID 83332

BIRCH CREEK TROUT INC  
C/O CLIFTON E JENSEN  
17825-A US HWY 30  
BLISS ID 83314

BLIND CANYON AQUACULTURE  
C/O GARY LEMMON  
2757 S 1050 E  
HAGERMAN ID 83332

BLUE LAKES TROUT FARMS INC  
C/O MICHAEL G GREENE  
133-W WARM CREEK RD  
TWIN FALLS ID 83301

BOSWELL TROUT FARMS  
C/O ROD GRIFFITH  
PO BOX 1846  
TWIN FALLS ID 83303-1846

LLOYD BROWN  
PO BOX 1846  
TWIN FALLS ID 83303-1846

BUCKEYE DITCH CO  
C/O DAN YORE  
18335 US HWY 30  
HAGERMAN ID 83332

CANYON SPRINGS  
C/O DAVID MC COLLUM  
PO BOX 1846  
TWIN FALLS ID 83303-1846

CITY OF HAGERMAN  
C/O JAMES V NORWOOD  
MAYOR  
PO BOX 158  
HAGERMAN ID 83332-0158

J WAYNE COURTNEY  
687 CANYON RIM RD  
TWIN FALLS ID 83301

CREEKSIDE VINYARDS  
C/O LARRY JOE THOMAS  
PO BOX 1846  
TWIN FALLS ID 83303-1846

MILDRED CULBERTSON  
PO BOX 386  
HAGERMAN ID 83332-0386

MIKE FLEMING  
17826 US HWY 30  
BLISS ID 83314

HARRY R GISLER  
108 DORAL DR  
JEROME ID 83338

ROBERT BRADLEY GISLER  
755 E 2800 SOUTH  
HAGERMAN ID 83332

ROBERT GROOMS  
PO BOX 90  
HAGERMAN ID 83332-0090

HAGERMAN WATER USERS ASSN  
C/O BILL JONES  
PO BOX 1846  
TWIN FALLS ID 83303-1846

ROBERT L HARNEY  
PO BOX 548  
HAGERMAN ID 83332-0548

BOB R HUNT  
981 JUSTICE GRADE  
HAGERMAN ID 83332-5460

IDAHO AQUACULTURE ASSN  
C/O LINDA L LEMMON  
PO BOX 767  
HAGERMAN ID 83332

JOY A KINYON  
1100 FAIR  
BUHL ID 83316

CRAIG LAUGHLIN  
PO BOX 1846  
TWIN FALLS ID 83303-1846

LEE PONDS  
C/O DAN LEE  
PO BOX 1846  
TWIN FALLS ID 83303-1846

KIM LEMMON  
2757 S 1050 EAST  
HAGERMAN ID 83332

RAIDA LOVELAND  
PO BO 1846  
TWIN FALLS ID 83303-1846

LYNCLIF FARMS  
C/O CLIFTON E JENSEN  
17825-A US HWY 30  
BLISS ID 83314

LAYNE OSBORNE  
966-A JUSTICE GRADE  
HAGERMAN ID 83332

THORLEIF RANGEN  
3157 LAURELWOOD DR  
TWIN FALLS ID 83301

B J ROWLAND  
2771 S 850 EAST  
HAGERMAN ID 83332

ROGER SHAFFER  
PO BOX 1846  
TWIN FALLS ID 83303-1846

STANLEY STANDAL  
609-A RIVER RD  
BLISS ID 83314

TALBOTT FISH PONDS  
C/O JAMES T TALBOTT  
917 JUSTICE GRADE  
HAGERMAN ID 83332

TRIPLE J RANCH  
C/O CLIFTON E JENSEN  
17825-A US HWY 30  
BLISS ID 83314

DAVID TUPPER  
1114 E 2700 S  
HAGERMAN ID 83332

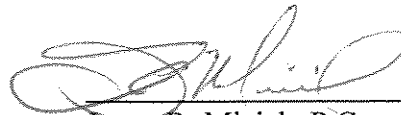
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